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UBIQUITI NETWORKS, INC. and  
UBIQUITI NETWORKS  
INTERNATIONAL LIMITED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SYNOPSYS, INC.,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., UBIQUITI  
NETWORKS INTERNATIONAL LIMITED,  
CHING-HAN TSAI, and DOES 1-20,  
inclusive

Defendants.

UBIQUITI NETWORKS, INC. and UBIQUITI  
NETWORKS INTERNATIONAL LIMITED,

Counterclaimants,

v.

SYNOPSYS, INC.,

Counterdefendant.

Case No. 3:17-cv-00561-WHO (LB)

**UBIQUITI DEFENDANTS'  
NOTICE AND MOTION FOR  
MORRISON & FOERSTER LLP  
TO WITHDRAW AS COUNSEL OF  
RECORD FOR DEFENDANT  
CHING-HAN TSAI**

Date: May 9, 2018

Time: 2:00 p.m.

Place: Courtroom 2, 17th Floor

Judge: Honorable William H. Orrick

1 **NOTICE OF MOTION**

2 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on Wednesday, May 9, 2018, at 2:00 p.m., or as soon as  
4 the matter may be heard by the Honorable William H. Orrick in Courtroom 2 of the United States  
5 District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco,  
6 CA 94102, Defendants and Counterclaimants Ubiquiti Networks, Inc. and Ubiquiti Networks  
7 International Limited (“Ubiquiti”) will and hereby do move this Court pursuant to Civil Local  
8 Rule 11-5 for an Order permitting Jennifer Lee Taylor, Stacey M. Sprenkel, Joyce Liou,  
9 Christopher Robinson, and Amanda D. Phillips of Morrison & Foerster LLP to withdraw as  
10 attorneys of record for Defendant Ching-Han Tsai.

11 This motion is based on this Notice of Motion and Motion; the Declaration of Jennifer Lee  
12 Taylor in Support of the Motion; and such other written or oral argument as may be presented  
13 before this motion is taken under submission by the Court.

14 **STATEMENT OF RELIEF REQUESTED**

15 Pursuant to Civil Local Rule 11-5, Ubiquiti respectfully requests an order permitting  
16 Jennifer Lee Taylor, Stacey M. Sprenkel, Joyce Liou, Christopher Robinson, and Amanda D.  
17 Phillips of Morrison & Foerster LLP to withdraw as attorneys of record for Defendant Ching-Han  
18 Tsai.

1 **MOTION**

2 On January 12, 2018, Morrison & Foerster LLP's engagement to provide legal services to  
3 Defendant Ching-Han Tsai in connection with this pending matter was terminated. (Declaration  
4 of Jennifer Lee Taylor in Support of Morrison & Foerster's Motion to Withdraw as Counsel for  
5 Ching-Han Tsai ("Taylor Decl.") ¶ 2.) Morrison & Foerster LLP has continued to represent the  
6 two corporate defendants, Ubiquiti Networks, Inc. and Ubiquiti Networks International Limited,  
7 in connection with this matter since January 12, 2018. (*Id.* ¶ 3.)

8 On or about January 22, 2018, Mr. Tsai retained The Business Litigation Group, P.C.  
9 ("BLG") to represent him in connection with this matter. (*Id.* ¶ 4.) Two attorneys from BLG—  
10 Will Fitton and Marc Bernstein—entered appearances in the matter on January 23, 2018 (Dkt.  
11 Nos. 115-116), and have since represented Mr. Tsai at depositions and the Court's hearings, but  
12 the record does not reflect a substitution of counsel as contemplated by Civil Local Rule 11-5.  
13 Ubiquiti moves the Court to permit Jennifer Lee Taylor, Stacey M. Sprenkel, Joyce Liou,  
14 Christopher Robinson, and Amanda D. Phillips of Morrison & Foerster LLP to withdraw as  
15 counsel of record for Defendant Ching-Han Tsai.

16 Dated: April 2, 2018

MORRISON & FOERSTER LLP

17  
18 By: /s/ Jennifer Lee Taylor  
19 Jennifer Lee Taylor

20 Attorneys for Defendants  
21 UBIQUITI NETWORKS, INC. and  
22 UBIQUITI NETWORKS  
23 INTERNATIONAL LIMITED  
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